

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA,
Plaintiff,

v.

Case no. 00-6277-CR

ERIC McKINNEY,
Defendant.

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**AGREED MOTION TO EXTEND TIME
TO FILE DEFENSE MOTIONS**

NOW COMES Defendant Eric McKinney, by and through his undersigned counsel, and for his Motion states:

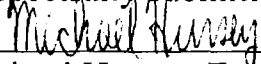
1. Undersigned counsel recently became counsel of record in the instant case. Previously, another private attorney had represented Mr. McKinney.
2. When the undersigned became counsel, the time for filing defense motions had already expired, per the Order previously entered by the U.S. Magistrate Judge.
3. However, at the status conference before U.S. District Judge Hurley, both he and the counsel for the government (Ms. Vorpe-Quinlan) indicated that they agreed that undersigned counsel could get additional time to file defense motions. Judge Hurley set the trial for the March 5, 2001, docket.

[Handwritten signature]

4. Undersigned counsel requests that he have 3 weeks (February 12) to file any defense motions. That way, the government can respond if necessary, and this Court could rule in advance of the trial setting.

WHEREFORE, Defendant McKinney prays that this Court will grant his AGREED MOTION TO EXTEND TIME TO FILE DEFENSE MOTIONS.

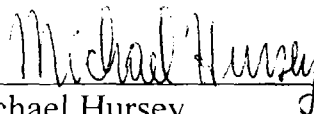
Respectfully submitted,


Michael Hursey, Esq.

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Facsimile: 954-779-7980

CERTIFICATE OF SERVICE

I certify that a true copy of this Motion was furnished by U.S. Mail to Assistant United States Attorney Robin Rosenbaum, United States Attorney's Office, 500 E. Broward Blvd., Ft. Lauderdale, FL 33301, this 15th day of January, 2001.


Michael Hursey
Fla. Bar No. 457698